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13 Attorneys for Defendant

14 UNITED AIRLINES, INC.

15 and all the parties on the signature page

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18
19 JEFFREY HANKINS,

20 Plaintiff,

21 vs.

22 UNITED AIRLINES, INC., and DOES I
23 through X, inclusive,

24 Defendants.

) Case No.: 2:21-cv-00274-APG-DJA

)
) **STIPULATION TO EXTEND EXPERT**
) **DISCLOSURES DEADLINES**

) **(FIRST REQUEST)**

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27 Plaintiff Jeffrey Hankins (“Plaintiff”) and Defendant United Airlines, Inc., (“United”) by
28 and through their respective attorneys of record, respectfully submit this stipulation to extend the

expert disclosures deadlines, to allow the parties to complete the fact discovery that is needed to facilitate the expert disclosures in this matter as follows:

(a) Discovery Completed

The parties state that the following discovery has been completed: the parties have exchanged initial disclosures and have served and responded to written discovery. Additionally, United has conducted its internal investigation of the incident.

(b) Discovery that Remains to be Completed

The parties state that the following fact discovery remains to be completed to facilitate expert disclosures in this matter: depositions of plaintiff and other witnesses, discovery directed at third parties, including plaintiff's health care providers, and IME of plaintiff. The deadline to complete fact discovery is 8/18/2021.

(c) There is Good Cause to Allow the Parties to Complete Fact Discovery Before Expert Disclosures

The parties have diligently pursued formal discovery and internal investigation of the subject incident, which involves a rejected takeoff of a commercial flight. Specifically, United maintains that the aircraft's pilot-in-command concluded that, according to the aircraft's instrumentation that provides the crew with information concerning the amount of thrust being generated by the engines, the left-hand engine was generating less thrust than should have been the case. Plaintiff alleges that he sustained serious physical injuries as a result of the incident, and incurred medical expenses, for surgeries and other medical treatment, in the amount of at least \$148,300.00. Despite the parties' best efforts to expedite fact discovery to prepare for expert disclosures, due to the highly technical nature of this matter, as well as, plaintiff's substantial alleged injuries and damages, the parties respectfully submit that there is good cause to extend the expert disclosures deadlines until after the end of fact discovery.

(d) A Proposed Schedule for Expert Disclosures

In light of the above, the parties respectfully request to continue the expert disclosures from 6/18/2021 to 8/18/2021, and rebuttal expert disclosures 7/19/2021 to 9/8/2021.

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1 So stipulated, subject to Court's approval.

2 Dated: June 4, 2021

VICTOR RANE

3
4 By: /s/ Jonathan W. Carlson

5 Richard A. Lazenby

6 Michael Cutler

Doug Griffith

-and-

7 Jonathan W. Carlson

8 McCormick Barstow, LLP

Attorneys for Defendant

9 UNITED AIRLINES, INC.

10
11 Dated: June 4, 2021

TIGNEY INJURY LAW FIRM

12
13 By: /s/ Justin L. Dewey

14 Bruce D. Tingey

15 Justin L. Dewey

Attorneys for Plaintiff

16 JEFFREY HANKINS

17 **ORDER**

18 **IT IS SO ORDERED.**

19 Dated: June 7th, 2021

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22 UNITED STATES MAGISTRATE JUDGE